

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>APRIL KIMBLE,</b>	)	
	)	<b>Civil Action No.:</b>
<b>Plaintiff,</b>	)	<b>1:19-cv-02549-JPB-JSA</b>
	)	
<b>v.</b>	)	
	)	
<b>QUALITY ASSIST, INC. and</b>	)	
<b>TRACEY BANKHEAD</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

COME NOW, Defendants Quality Assist, Inc. and Tracey Bankhead (collectively “Defendants”), pursuant to Fed. R. Civ. P. 56 and LR 56 NDGa, and hereby submit their Motion for Summary Judgment on all counts of Plaintiff’s Second Amended Complaint (Doc 59). Defendants now ask this Court to grant the instant Motion because no genuine issue exists as to any material fact related to Plaintiff’s claims of discrimination and retaliation. As such, Defendants are entitled to judgment as a matter of law. Defendants support the instant Motion with their Memorandum of Law, a Statement of Undisputed Material Facts, and evidence from the record, all filed simultaneously herewith.

Respectfully submitted this 14<sup>th</sup> day of June 2021,

/s/ Robert C.D. McDonald  
Georgia Bar No. 489600

Attorney for Defendants Quality  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 14, 2021, I electronically filed the foregoing Motion For Summary Judgment, Memorandum of Law in support thereof, Statement Of Material Facts For Which There Is No Genuine Issue To Be Tried, and supportive evidence from the record using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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